

EXHIBIT 1

Marc J. Randazza
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
Tel: (702) 420-2001
ecf@randazza.com

Herschel P. Fink (Reg. # P13427).
JAFFE RAIT HEUER & WEISS, P.C.
Grand Park Centre Building
28 W. Adams Ave., Suite 1500
Detroit, MI 48226
Tel: (313) 800-6500
hfink@jaffelaw.com

*Attorneys for Defendants
GotNews, LLC & Chares C. Johnson*

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JOEL VANGEHLUWE, et al.,

Plaintiffs,

v.

GOTNEWS, LLC, et. al.

Defendants.

Case No.: 2:18-cv-10542-LJM-EAS

**DEFENDANT CHARLES JOHNSON'S
OFFER OF JUDGMENT TO PLAINTIFF
JEROME VANGHELUWE**

Defendant Charles Johnson makes the following offer of judgment under Fed. R. Civ. P. 68 to Plaintiff Jerome Vangheluwe. Defendant makes this offer more than 14 days before the date set for trial in accordance with Fed. R. Civ. P. 68(a).

Plaintiff Jerome Vangheluwe has sued a shareholder of an LLC with absolutely no justification nor argument for piercing the corporate veil. Nevertheless, rather than bear the expense of litigation, Mr. Johnson is willing to

allow judgment to be taken against him to resolve Plaintiff Jerome Vangheluwe's claims.

Pursuant to Fed. R. Civ. P. 68, Mr. Johnson hereby offer Plaintiff Jerome Vangheluwe to take a judgment against him in this action to include the following: **The total sum of \$4,990, inclusive of Plaintiff Jerome Vangheluwe's costs (including Plaintiff Jerome Vangheluwe's attorneys' fees), accrued to the date of this offer, to be paid by Mr. Johnson, for all causes of action and claims for damages set forth in Plaintiffs' Amended Complaint as to Mr. Johnson.**

This offer is unconditional. This judgment shall be in full satisfaction of all federal and state law claims or rights that Plaintiff Jerome Vangheluwe may have to damages, or any other form of relief, arising out of the alleged acts or omissions of Mr. Johnson, or any official, employee, or agent, either past or present, of Mr. Johnson, or any agency thereof, in connection with the facts and circumstances that are the subject of this action.

This offer of judgment is made for the purposes specified in Fed. R. Civ. P. 68 and is not to be construed as an admission of liability by Mr. Johnson, or any official, employee, or agent of Mr. Johnson, nor is it an admission that Plaintiff Jerome Vangheluwe has suffered any damages.

Acceptance of this offer of judgment will act to release and discharge Mr. Johnson, his successors and/or assigns, and all past and present officials, employees, representatives, and agents of Mr. Johnson from all claims that were or could have been alleged by Plaintiff Jerome Vangheluwe in the above-referenced action.

This offer of judgment will remain open and irrevocable for 14 days after service in accordance with Fed. R. Civ. P. 68(a). If Plaintiff Jerome Vangheluwe does not accept within 14 days after service, the offer is considered withdrawn in accordance with Fed. R. Civ. P. 68(b).

Dated: May 16, 2018

Respectfully Submitted,

/s/ Marc J. Randazza

Marc J. Randazza
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117

Herschel P. Fink (Reg. # P13427).
JAFHE RAIT HEUER & WEISS, P.C.
Grand Park Centre Building
28 W. Adams Ave., Suite 1500
Detroit, MI 48226

Attorneys for Defendants
GotNews, LLC & Charles C. Johnson

Case No. 2:18-cv-10542-LJM-EAS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of May 2018, I served a true and correct copy of the foregoing document via electronic mail and U.S. Mail upon counsel for Plaintiffs listed below:

Andrew B. Sommerman
SOMMERMAN, MCCAFFITY & QUESADA, L.L.P.
3811 Turtle Creek Boulevard, Suite 1400
Dallas, Texas 75219
andrew@textrial.com

Raechel M. Badalamenti
KIRK, HUTH, LANGE & BADALAMENTI, PLC
19500 Hall Road, Suite 100
Clinton Township, MI 48038
rbadalamenti@khlblaw.com

Respectfully Submitted,



Employee,
Randazza Legal Group, PLLC